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## UNITED STATES DISTRICT COURT

## **DISTRICT OF NEVADA**

KEVIN DROVER, individually and on behalf	Case No. 2:12-cv-00510-LRH-VCF
of all others similarly situated;	
Plaintiffs,	STIPULATION, REQUEST AND ORDER EXTENDING TIME TO ANSWER OR OTHERWISE RESPOND TO THE
vs.	CLASS ACTION COMPLAINT
LG ELECTRONICS USA, INC.,	(First Request)
Defendant.	

Pursuant to Local Rules 6-1 and 7-1, Defendant LG Electronics USA, Inc. ("Defendant"), by and through its undersigned counsel, and Plaintiff Kevin Drover ("Plaintiff"), by and through his undersigned counsel, hereby respectfully submit this Stipulation, Request and Order Extending Time to Answer or Otherwise Respond to Plaintiff's Class Action Complaint. This is the First Request for an Extension of Time to File an Answer or Otherwise Respond to Plaintiff's Complaint. Defendant was served with a copy of the Summons and Complaint in this matter on March 30, 2012 and its answer or other response was due by April 20, 2012. Prior to the

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1 expiration of the date to respond, Defendant sought an extension of time in order to retain local 2 Nevada counsel. 3 Upon agreement by and between all the parties hereto as set forth herein, the undersigned 4 respectfully request this Court grant an extension of time, up to and including May 25, 2012 for 5 Defendant to file an answer or otherwise respond to Plaintiff's Complaint. 6 DATED: April 24, 2012. 7 FEDERMAN & SHERWOOD MCDONALD CARANO WILSON LLP 8 /s/ William B. Federman (by consent) /s/ Pat Lundvall Pat Lundvall, Esq. (NSBN 3761) WILLIAM B. FEDERMAN 9 8 10205 N. Pennsylvania Avenue Kristen Gallagher, Esq. (NSBN 9561) Oklahoma City, Oklahoma 73120 2300 West Sahara Avenue, Suite 1000 10 9 (405)235-1560 Telephone Las Vegas, Nevada 89102 (405) 239-2112 Facsimile Telephone: (702) 873-4100 11 Facsimile: (702) 873-9966 wbf@federmanlaw.com (admitted *pro hac vice*) lundvall@mcdonaldcarano.com 12 kgallagher@mcdonaldcarano.com Dennis L. Kennedy, Esq. (NSBN 1462) 13 Joseph A. Liebman, Esq. (NSBN 10125) Sandra C. Mccallion, Esq. Melanie Grossman, Esq. **BAILEY KENNEDY** 14 8984 Spanish Ridge Avenue COHEN & GRESSER LLP Las Vegas, Nevada 89148-1302 800 Third Avenue 15 Telephone: (702) 562-8820 New York, New York 10022 212 957 7600 phone Facsimile: (701) 562-9921 16 dkennedy@baileykennedy.com 212 957 4514 fax iliebman@baileykennedy.com smccallion@cohengresser.com 17 mgrossman@cohengresser.com Attorneys for Plaintiff Kevin Drover (pro hac vice applications to be submitted) 18 Attorneys for Defendant LG Electronics, USA, Inc. 19 IT IS SO ORDERED: 20 21 UNITED STATES DISTRICT JUDGE 22 DATED: 23 24 25 26 27 28